UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ENCOMPASS AVIATION, LLC,

Plaintiff,

- against -

18 Civ. 5530 (CM)

SURF AIR INC. (F/K/A SURF AIRLINES INC.),

Defendant.

Plaintiff Encompass Aviation, LLC ("Encompass") and Defendant/Counter-Claimant Surf Air Inc. ("Surf"), having reached an agreement to settle this matter, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), hereby stipulate and agree that all of the claims and counterclaims as between Encompass and Surf in this action shall be dismissed in their entirety with prejudice, each party to bear its own costs and attorneys' fees.

Dated: January 30, 2019 New York, NY

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By: /

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